

August 9, 2013

Ms. Marlene H. Dortch  
Secretary  
Federal Communication Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Notice of *Ex Parte* Communication, WC Docket No. 13-184

Dear Ms. Dortch:

On August 1, 2013, Mark Gabehart, Executive Director of Information Services for the Round Rock Independent School District (RRISD), Todd Church, RRISD Telecommunications Manager, Scott Stansbury, RRISD Director of Telecommunications Infrastructure, Brent Englehardt, RRISD Network Support Specialist, and Polly Gifford and Ed Gifford of EPS Consulting Inc. (collectively, RRISD Technology Staff) spoke via telephone with Lisa Hone, Bryan Boyle, Katori Brown, Soumitra Das, Charles Eberle, and Mark Nadel of the Wireline Competition Bureau. The purpose of the call was to discuss RRISD's high-capacity broadband network and the district's technology plan for the coming years, and also to seek the RRISD Technology Staff's input on the Commission's July 23, 2013 Notice of Proposed Rulemaking in the above-referenced docket. The RRISD Technology Staff provided the following information during the call:

- *Network infrastructure and costs.* RRISD is composed of approximately 46,000 students and serves 48 schools and locations in a suburban area north of Austin, TX. RRISD owns its fiber optic network, consisting of 150 miles of fiber deployed in multiple rings. RRISD partnered with Grande Networks to build the network in 2000 and upgraded to 10 Gbps in 2007. RRISD elected to build and own its fiber because it was able to secure low long-term costs and because Grande Networks had pole attachment agreements in place. A "super ring" provides redundant 10 Gbps connections between six sites and the district technology center. Underlying "sub-rings" connect six to eight locations each. RRISD has a 15-year maintenance contract for the network at the cost of \$60,000/yr.
- *Internet access.* RRISD purchases Internet access service from AT&T, at a rate of \$13,000/month for two 1 Gbps connections at the district data center. However, Ms. Gifford noted that rates in the Austin area have fallen below \$5,000/month for 1 Gbps. RRISD is in a long-term contract with AT&T, but they regularly reevaluate based on the current market and recently sought bids to lower their Internet access costs. RRISD previously paid \$26,000/month for 600 Mbps. AT&T agreed to provide higher speeds at a lower rate after RRISD put out a new Form 470. Ms. Gifford also said that districts' bandwidth needs are rapidly growing because of increased use of cloud computing.

- Competitive bidding and negotiation.* RRISD Technology Staff emphasized the importance of the competitive bidding process in obtaining the best price for services. As noted above, RRISD cut its Internet access costs in half by seeking bids even though it was under contract. The RRISD Technology Staff stated that school districts often don't know what they should be paying for technology services, allowing incumbent providers to win contracts without much competition or negotiation. They acknowledged that by electing to own their fiber network in partnership with Grande Networks, they are tied to a single carrier more than they would be if the district did not own the network. However, RRISD has been able to negotiate favorable terms with Grande and has not yet had a problem with Grande raising prices to a level just below the cost for a new carrier to build out fiber for RRISD. The RRISD Technology Staff agreed that districts that have built robust networks should still analyze costs and be open to entering into agreements with new providers.
- Internal connections and WiFir.* RRISD is a 53% district and has not frequently applied for Priority 2 funding in recent years. However, the district is working on new RFPs that will seek Priority 2 funding. Ms. Gifford stated that she works with school districts at several E-rate discount levels and that advanced planning in three to five year increments is the key to managing technology costs. Mr. Englehardt stated that RRISD currently has 4,000 wireless access points and just purchased an additional 1,900. This purchase will allow RRISD to upgrade to one WAP per classroom. The costs for access points is \$350 per access point plus \$250 to install the access point, run the cable, upgrade the switch and get licensing. All WAPs are 802.11n and many have already been in service for over three years. Each school has both a secure and guest wireless network. RRISD's local area networks (LANs) include a 10 Gbps head-end switch at each campus.
- State master contract.* RRISD does not purchase service through the Texas master contract with AT&T. RRISD Technology Staff explained that, though the master contract rates were competitive at the time they were set, competitive carriers now offer lower rates. They stated that many districts utilize the master contract, particularly smaller, rural districts because it is a simpler process than searching for providers on their own without the time, expertise or knowledge.
- Cloud Computing and Technology Plans.* The RRISD Technology Staff emphasized the importance of 24/7 learning and off-campus access to technology resources. Cloud computing is what's driving revisions to RRISD's technology plan, specifically how to develop infrastructure capable of supporting many devices simultaneously accessing the cloud. Schools are interested in utilizing many new cloud-based applications. Cloud computing needs will require RRISD to upgrade its Internet access bandwidth to 5 Gbps

in the near future and 10 Gbps shortly thereafter. Increased use of cloud computing also eases the burden on district servers because they do not have to host the material. RRISD is planning for the curriculum department to play a larger role in developing a plan for cloud technology (exploring online learning and virtual classrooms) and seeks to acquire the support and infrastructure necessary to support cloud computing as well as mobile devices. RRISD Technology Staff distinguished between student services, which are moving toward the cloud, and RRISD enterprise functions which are still on the RRISD network.

- *Misc*
  - RRISD Technology Staff emphasized the importance of local government support for technology in schools. The district receives substantial funding from local bond issues.
  - RSSID asks that the Commission consider providing lump sum subsidies so that school district officials can have greater flexibility and create technology budgets with more certainty.
  - Ms. Gifford suggested that E-rate should support firewall and content filter software.
  - Ms. Gifford suggested that there should be a public listing of pricing or benchmarks provided to help educate schools on what prices are competitive.
  - The Commission should find a way to facilitate subsidies that support 24/7 learning.

Respectfully submitted,

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Charles Eberle

Attorney-Adviser, Telecommunications Access Policy Division, Wireline Competition Bureau